1 Honorable J. Robert S. Lasnik 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE 8 WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 RAJU A.T. DAHLSTROM, CASE NO. 2:16-cv-01874-RSL 11 STIPULATION AND 12 Plaintiff, [PROPOSED] ORDER FOR 13 **EXTENSION OF DISPOSITIVE** v. MOTION DEADLINE 14 UNITED STATES, 15 Defendant. Noted for Consideration: 16 June 11, 2019 17

COME NOW the parties, by and through their respective counsel, stipulate and respectfully request that the Court extend the dispositive motion deadline by one week:

<u>Deadline</u>	Old Deadline	New Deadline	
Dispositive Motion	June 11, 2019	June 18, 2019	
Deadline		·	

Assistant United States Attorney Tricia Boerger, the attorney that has been litigating this case on behalf of the United States since 2017, is currently preparing for an upcoming trial commencing on July 1, 2019, as well as handling the rest of her litigation docket. The undersigned Assistant United States Attorney was recently assigned to handle this case for the purpose of dispositive motion practice to provide assistance to Ms. Boerger. The undersigned is currently reviewing the docket, including the Court's

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prior orders, pleadings, and discovery, to ensure accuracy of any motion filed with the 2 Court. Moreover, it is likely that the undersigned will have to coordinate with multiple 3 federal agencies and potentially the Sauk-Suiattle Indian Tribe. The current deadline to file a dispositive motion is inadequate for completion of this review in light of the 4 5 undersigned's recent assignment. However, a one-week extension would be sufficient 6 for any dispositive motion on the part of the United States to be prepared and filed. 7 Plaintiff's counsel has agreed to stipulate to the extension. 8 Accordingly, the parties stipulate to the extension and respectfully request a one-9 week extension of the dispositive motion deadline. 10 This requested extension will not affect the scheduled trial date. 11 DATED this 11th day of June, 2019. 12 13 LAKE HILLS LEGAL SERVICES PC BRIAN T. MORAN 14 United States Attorney 15 s/Richard Lamar Pope, Jr. 16 s/Michelle R. Lambert Richard Lamar Pope, Jr., WSBA#21118 Michelle R. Lambert, NYS#466657 17 Lake Hills Legal Services PC Assistant United States Attorney 1560 NE 8th Street, Suite B1-358 18 United States Attorney's Office Bellevue, Washington 98008 1201 Pacific Ave, Suite 700 19 Phone: 425-829-5305 Tacoma, Washington 98402 20 Email: Rp98007@gmail.com Phone: 253-428-3824 Email: michelle.lambert@usdoj.gov 21 Attorney for Plaintiff 22 Attorney for Defendant United States 23 24 25 26 27 28

1 | [PROPOSED] ORDER The parties having so stipulated and agreed, it is SO ORDERED. The dispositive motion deadline is extended to June 18, 2019. Dated this **day** of June, 2019. United States District Judge .27